

# VALHALLA HILLS MOBILE HOME PARK (PWS 2290043) SOURCE WATER ASSESSMENT FINAL REPORT

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October 24, 2001



## State of Idaho Department of Environmental Quality

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## Executive Summary

Under the Safe Drinking Water Act Amendments of 1996, all states are required by the U.S. Environmental Protection Agency to assess every source of public drinking water for its relative sensitivity to contaminants regulated by the act. This assessment is based on a land use inventory of the designated assessment area, sensitivity factors associated with the wells, and aquifer characteristics.

This report, *Source Water Assessment for Valhalla Hills Mobile Home Park*, describes the public drinking water system, the boundaries of the zones of water contribution, and the associated potential contaminant sources located within these boundaries. This assessment should be used as a planning tool, taken into account with local knowledge and concerns, to develop and implement appropriate protection measures for this source. **The results should not be used as an absolute measure of risk and they should not be used to undermine public confidence in the water system.**

The Valhalla Hills Mobile Home Park drinking water system consists of one well situated in the crystalline rock aquifer approximately 1½ miles south of Moscow. A review of the State drinking water sampling data (DWIMS) indicates that there have been repeated detections of total coliform microbial contamination for the well dating back to 1995. Records in DWIMS date back to 1992. The source and route of microbial contamination could be somewhere downstream of the well or contamination could have entered at the wellhead. The source of microbial contamination should be determined and eliminated. Coliform bacteria in drinking water present a serious threat to human health. There have been no detections of the inorganic contaminant (IOC) nitrate, no recorded detections of volatile organic contaminants (VOC) like petroleum products or synthetic organic contaminants (SOC) like pesticides for this system.

This assessment should be used as a basis for determining appropriate new protection measures or re-evaluating existing protection efforts. No matter what ranking a source receives, protection is always important. Whether the source is currently located in a “pristine” area or an area with numerous industrial and/or agricultural land uses that require education and surveillance, the way to ensure good water quality in the future is to act now to protect valuable water supply resources.

Most of the designated areas are outside the direct jurisdiction of the Valhalla Hills Mobile Home Park. Partnerships with state and local agencies and industry groups should be established and are critical to success. Due to the time involved with the movement of ground water, source water protection activities should be aimed at long-term management strategies even though these strategies may not yield results in the near term. Source water protection activities for agriculture should be coordinated with the Idaho State Department of Agriculture, the Soil Conservation Commission, the local Soil Conservation District, and the Natural Resources Conservation Service.

A community with a fully developed source water protection program will incorporate many strategies. For assistance in developing protection strategies please contact the Lewiston Regional Office of the Idaho Department of Environmental Quality or the Idaho Rural Water Association.

# **SOURCE WATER ASSESSMENT FOR VALHALLA HILLS MOBILE HOME PARK, LATAH COUNTY, IDAHO**

## **Section 1. Introduction - Basis for Assessment**

The following sections contain information necessary to understand how and why this assessment was conducted. **It is important to review this information to understand what the ranking of this source means.** A map showing the delineated source water assessment area and the inventory of significant potential sources of contamination identified within that area are attached. The list of significant potential contaminant source categories and their rankings, used to develop this assessment, is also attached.

### **Level of Accuracy and Purpose of the Assessment**

The Idaho Department of Environmental Quality (DEQ) is required by the U.S. Environmental Protection Agency (EPA) to assess the over 2,900 public drinking water sources in Idaho for their relative susceptibility to contaminants regulated by the Safe Drinking Water Act. This assessment is based on a land use inventory of the delineated assessment area, sensitivity factors associated with the wells, and aquifer characteristics. All assessments must be completed by May of 2003. The resources and time available to accomplish assessments are limited. Therefore, an in-depth, site-specific investigation to identify each significant potential source of contamination for every public water system is not possible. **This assessment should be used as a planning tool, taken into account with local knowledge and concerns, to develop and implement appropriate protection measures for this source. The results should not be used as an absolute measure of risk and they should not be used to undermine public confidence in the water system.**

The ultimate goal of this assessment is to provide data to local communities to develop a protection strategy for their drinking water supply system. The Idaho Department of Environmental Quality (DEQ) recognizes that pollution prevention activities generally require less time and money to implement than treating a public water supply system once it has been contaminated. DEQ encourages communities to balance resource protection with economic growth and development. The decision as to the amount and types of information necessary to develop a source water protection program should be determined by the local community based on its own needs and limitations. Wellhead or source water protection is one facet of a comprehensive growth plan, and it can complement ongoing local planning efforts.

## **Section 2. Conducting the Assessment**

### **General Description of the Source Water Quality**

The well at Valhalla Hills Mobile Home Park is a community well with 27 connections serving approximately 75 people. Valhalla Hills Mobile Home Park is located in Latah County along Highway 95, approximately 1 ½ miles south of Moscow (Figure 1).

The only significant water chemistry problem recorded for the Valhalla Hills Mobile Home Park is repeated detections of microbials. Detections of microbials in drinking water constitute a serious threat to human health and should be dealt with. No detections of IOC, SOC or VOC have been recorded.

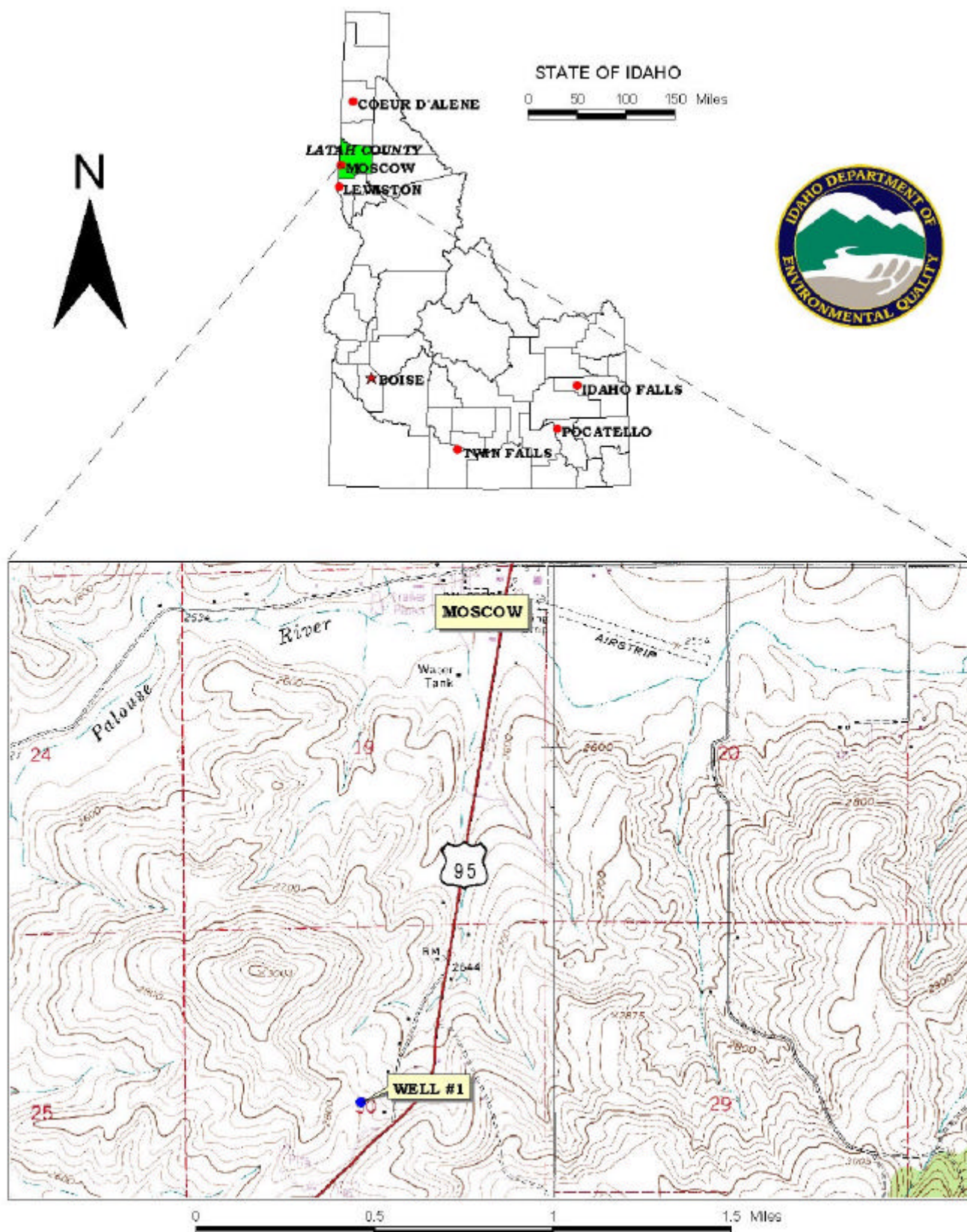
### **Defining the Zones of Contribution--Delineation**

The delineation process establishes the physical area around a well that will become the focal point of the assessment. The process includes mapping the boundaries of the zone of contribution into time of travel zones (zones indicating the number of years necessary for a particle of water to reach a well) for water in the aquifer. DEQ used a refined computer model approved by the EPA in determining the 3-year (Zone 1B), 6-year (Zone 2), and 10-year (Zone 3) time-of-travel (TOT) for water associated with the Crystalline rock aquifer in the vicinity of the Valhalla Hills Mobile Home Park. The computer model used site- specific data, assimilated by DEQ from a variety of sources including local area well logs. Wells at Valhalla Hills Mobile Home Park draw water from Precambrian metasediments within the geologic formation known as the Belt Supergroup. Groundwater flow in this aquifer tends to follow topography and often ranges from 15 to 100 feet deep. Hydrologic gradients may be very steep and highly irregular. Based on this information the delineation areas for the two Valhalla Hills Mobile Home Park wells are estimated to follow paths as depicted in Figures 2 and 3. The actual data used by DEQ in determining the source water assessment delineation areas is available upon request.

### **Identifying Potential Sources of Contamination**

A potential source of contamination is defined as any facility or activity that stores, uses, or produces, as a product or by-product, the contaminants regulated under the Safe Drinking Water Act and has a sufficient likelihood of releasing such contaminants at levels that could pose a concern relative to drinking water sources. The goal of the inventory process is to locate and describe those facilities, land uses, and environmental conditions that are potential sources of ground water contamination. The locations of potential sources of contamination within the delineation areas were obtained by field surveys conducted by DEQ and from available databases. The dominant land use outside the Valhalla Hills Mobile Home Park is undeveloped rangeland with some non-irrigated agricultural land. Land use within the immediate area of the wellheads consists of the mobile home park.

**FIGURE 1. Geographic Location of the Valhalla Hills Mobile Home Park**



It is important to understand that a release may never occur from a potential source of contamination provided best management practices are used at the facility. Many potential sources of contamination are regulated at the federal level, state level, or both, to reduce the risk of release. Therefore, when a business, facility, or property is identified as a potential contaminant source, this should not be interpreted to mean that this business, facility, or property is in violation of any local, state, or federal environmental law or regulation. What it does mean is that the potential for contamination exists due to the nature of the business, industry, or operation. There are a number of methods that water systems can use to work cooperatively with potential sources of contamination, such as educational visits and inspections of stored materials. Many owners of such facilities may not even be aware that they are located near a public water supply well.

### Contaminant Source Inventory Process

A two-phased contaminant inventory of the study area was conducted during May of 2000. The first phase involved identifying and documenting potential contaminant sources within the Valhalla Hills Mobile Home Park Source Water Assessment Area through the use of computer databases and Geographic Information System maps developed by DEQ. The second or enhanced phase of the contaminant inventory involved contacting the operator to validate the sources identified in phase one and to add any additional potential sources in the area.

Results of the inventory process indicate there are eight potential contaminant sources at Valhalla Hills Mobile Home Park (Figure 2). Contaminant sources looked for include IOCs, VOCs, SOC and microbials. Although microbials have been detected, no obvious source was found during the contaminant inventory process. It is likely that the source of contamination is normal surface bacteria that has been routed into the well via the wellhead or it could have entered drinking water along the delivery system somewhere downstream of the well. Since re-sampling immediately after the initial positive sample results also detected microbials it is highly unlikely that sampling error occurred. Table 1 lists the eight potential contaminants found during the inventory process. Figure 2 depicts the delineation zones and locations for the potential contaminant sources for the well.

**Table 1. Valhalla Hills Mobile Home Park Well, Potential Contaminant Inventory**

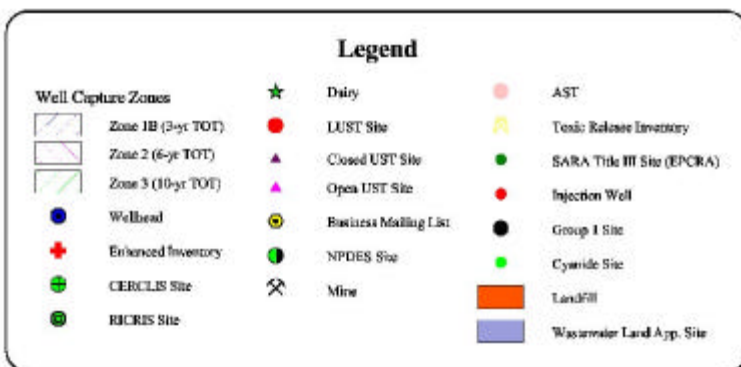
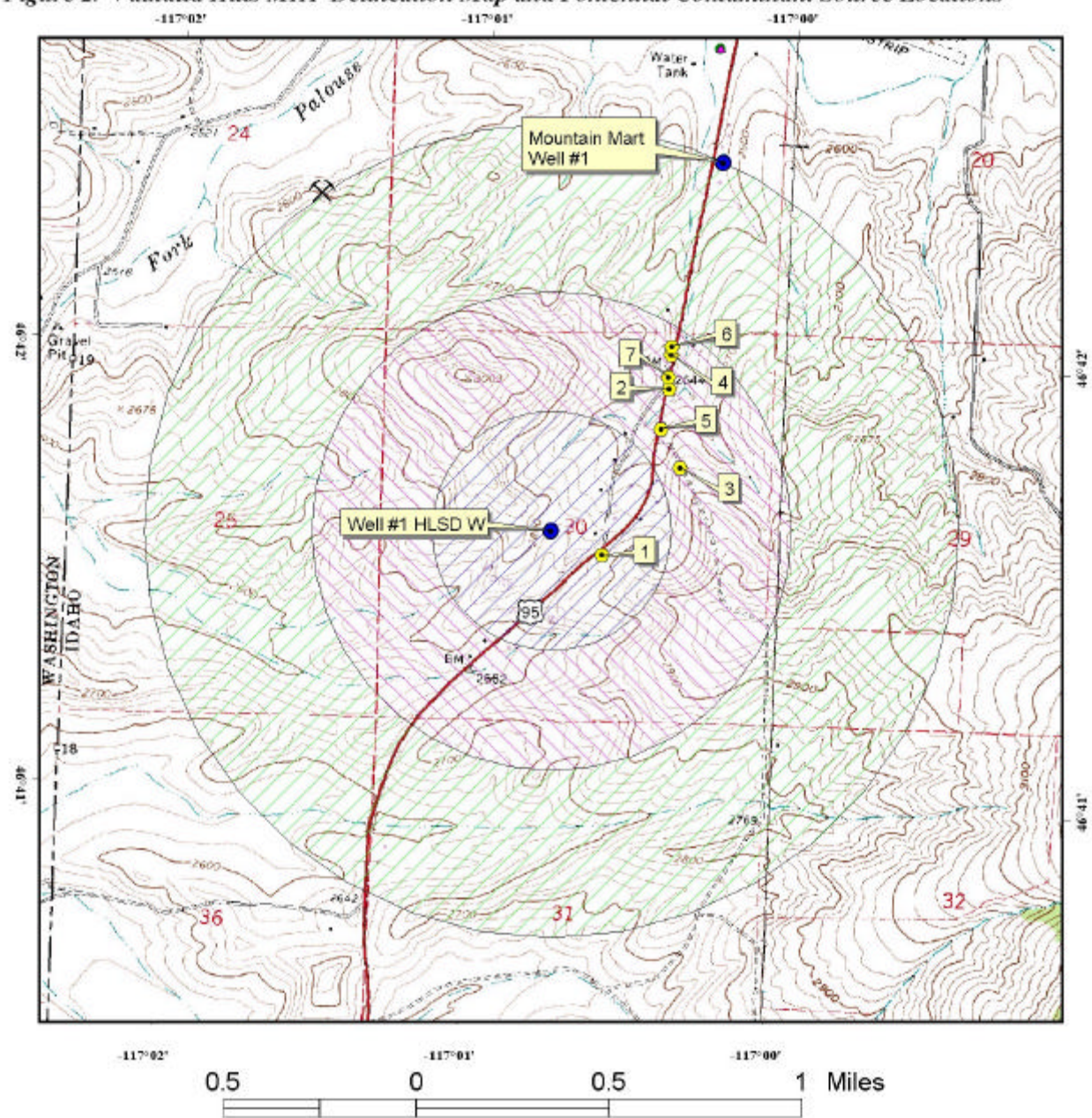
SITE #	Source Description <sup>1</sup>	TOT Zone <sup>2</sup> (years)	Source of Information	Potential Contaminants <sup>3</sup>
1	Mini Storage	3	Database Search	IOC,VOC, SOC, M
2	Auto Repair	6	Database Search	IOC,VOC, SOC
3	Trucking Company	6	Database Search	IOC,VOC, SOC
4	Gas Station	6	Database Search	IOC,VOC, SOC
5	Cabinet Shop	6	Database Search	IOC,VOC
6	Machine Shop	6	Database Search	IOC,VOC
7	C0nstruction Company	6	Database Search	IOC,VOC
8	Highway	3, 6 & 10	Database Search	IOC,VOC, SOC, M

<sup>2</sup> TOT = time-of-travel (in years) for a potential contaminant to reach the well

<sup>3</sup> IOC = inorganic chemical, VOC = volatile organic chemical, SOC = synthetic organic chemical, M = microbials



Figure 2. Valhalla Hills MHP Delineation Map and Pontential Contaminant Source Locations



**PWS# 2290043**  
**Well #1 HLSD W**

MAR 27 2001, 10:28:56

### **Section 3. Susceptibility Analyses**

The water system's susceptibility to contamination was ranked as high, moderate, or low-risk according to the following considerations: hydrologic characteristics, physical integrity of the well, land use characteristics, and potentially significant contaminant sources. The susceptibility rankings are specific to a particular potential contaminant or category of contaminants. Therefore, a high susceptibility rating relative to one potential contaminant does not mean that the water system is at the same risk for all other potential contaminants. The relative ranking that is derived for each well is a qualitative, screening-level step that, in many cases, uses generalized assumptions and best professional judgement. The following summaries describe the rationale for the susceptibility ranking.

#### **Hydrologic Sensitivity**

At Valhalla Hills Mobile Home Park, hydrologic sensitivity risk rating is moderate for the system's single well (Table 2). The wellhead is collared in soils in the poor to moderately well drained class, which could facilitate the downward movement of contaminants. However, the well log indicates that the local vadose zone below the soil contains some clay, which could retard downward movement of contaminants.

#### **Well Construction**

Well construction directly affects the ability of a well to protect the aquifer from contaminants. The well has a high-risk construction score based largely on the absence of drill hole information on the drill hole log. Without more information the assumption must be made that the wellhead seal is not adequate and the well is not protected from floodwaters. A 1995 Sanitary Survey inspection brought up these and other problems but there is no follow-up information indicating that the problems have been corrected. Casing thickness for the well is not up to current standards. The Idaho Department of Water Resources *Well Construction Standards Rules* (1993) require all Public Water Systems (PWSs) to follow DEQ standards as well. IDAPA 58.01.08.550 requires that PWSs follow the *Recommended Standards for Water Works* (1997) during construction. Table 1 of the *Recommended Standards for Water Works* (1997) states that 8-inch casing requires a thickness of 0.322 inch and 6-inch casing requires a thickness of 0.280 inch. Although no apparent problems have been found associated with the wellhead, repeated microbial contamination in the well leaves the possibility that contamination is entering the well via the wellhead.

#### **Potential Contaminant Source and Land Use**

The predominant land use in the area is residential, undeveloped rangeland and non-irrigated agriculture. The only significant water quality problem recorded from the Valhalla Hills Mobile Home Park water system that may be associated with local land use is multiple detections of total coliform microbial contamination associated with the water system. The contaminant entry route for microbial contamination could be along the well casing or it could have entered the system somewhere downstream of the well. There are no recorded detections of IOCs like metals or nitrate, VOCs like petroleum products or SOCs like pesticides.



## Final Susceptibility Rating

The Valhalla Hills Mobile Home Park drinking water system has an overall high-risk rating for microbial contamination. This high-risk rating is automatic due to repeated detection of total coliform microbial contamination for the well. No IOC (nitrate) detections and no detections of SOC or VOC contaminants have been recorded for the Valhalla Hills Mobile Home Park. All conditions combined result in an overall moderate-risk rating for potential contamination in those categories (Table 2).

**Table 2. Summary of Valhalla Hills Mobile Home Park Susceptibility Evaluation**

Well	Susceptibility Scores <sup>1</sup>									
	Hydrologic Sensitivity	Contaminant Inventory				System Construction	Final Susceptibility Ranking			
		IOC	VOC	SOC	Microbials		IOC	VOC	SOC	Microbials
Well 1	M	L	L	L	H*	H	M	M	M	H*

<sup>1</sup>H = High Susceptibility, M = Moderate Susceptibility, L = Low Susceptibility, IOC = inorganic chemical, VOC = volatile organic chemical, SOC = synthetic organic chemical, H\* = Automatically scored in High Risk category due to detections of Microbials in sampling

## **Section 4. Options for Source Water Protection**

The susceptibility assessment should be used as a basis for determining appropriate new protection measures or re-evaluating existing protection efforts. No matter what the susceptibility ranking a source receives, protection is always important. Whether the source is currently located in a “pristine” area or an area with numerous industrial and/or agricultural land uses that require education and surveillance, the way to ensure good water quality in the future is to act now to protect valuable water supply resources.

An effective source water protection program is tailored to the particular local source water protection area. A community with a fully developed source water protection program will incorporate many strategies. The primary water quality issue currently facing Valhalla Hills Mobile Home Park is that of microbial contamination associated with the single well in this system. Since 1995, there have been repeated detections of total coliform microbial contamination. Microbial contamination in drinking water is serious threat to human health. Efforts need to be made to determine where microbials are entering Valhalla Hills Mobile Home Park’s drinking water system. If a source and route is found it should be eliminated. Most of the designated areas are outside the direct jurisdiction of the Valhalla Hills Mobile Home Park. Partnerships with state and local agricultural agencies and industry groups should be established and are critical to success. Due to the time involved with the movement of ground water, wellhead protection activities should be aimed at long-term management strategies even though these strategies may not yield results in the near term. Source water protection activities for agriculture should be coordinated with the Idaho State Department of Agriculture, the Soil Conservation Commission, the Soil and Water Conservation District, and the Natural Resources Conservation Service.

### **Assistance**

Public water suppliers and others may call the following DEQ offices with questions about this assessment and to request assistance with developing and implementing a local protection plan. In addition, draft protection plans may be submitted to the DEQ office for preliminary review and comments.

Lewiston Regional DEQ Office      (208) 799-4370

State DEQ Office      (208) 373-0502

Website: <http://www2.state.id.us/deq>

Water suppliers serving fewer than 10,000 persons may contact John Bokor, Idaho Rural Water Association, at 1-800-962-3257 for assistance with wellhead protection strategies.

## POTENTIAL CONTAMINANT INVENTORY

### LIST OF ACRONYMS AND DEFINITIONS

**AST (Aboveground Storage Tanks)** – Sites with aboveground storage tanks.

**Business Mailing List** – This list contains potential contaminant sites identified through a yellow pages database search of standard industry codes (SIC).

**CERCLIS** – This includes sites considered for listing under the **Comprehensive Environmental Response Compensation and Liability Act (CERCLA)**. CERCLA, more commonly known as Superfund is designed to clean up hazardous waste sites that are on the national priority list (NPL).

**Cyanide Site** – DEQ permitted and known historical sites/facilities using cyanide.

**Dairy** – Sites included in the primary contaminant source inventory represent those facilities regulated by Idaho State Department of Agriculture (ISDA) and may range from a few head to several thousand head of milking cows.

**Deep Injection Well** – Injection wells regulated under the Idaho Department of Water Resources generally for the disposal of stormwater runoff or agricultural field drainage.

**Enhanced Inventory** – Enhanced inventory locations are potential contaminant source sites added by the water system. These can include new sites not captured during the primary contaminant inventory, or corrected locations for sites not properly located during the primary contaminant inventory. Enhanced inventory sites can also include miscellaneous sites added by the Idaho Department of Environmental Quality (DEQ) during the primary contaminant inventory.

**Floodplain** – This is a coverage of the 100year floodplains.

**Group 1 Sites** – These are sites that show elevated levels of contaminants and are not within the priority one areas.

**Inorganic Priority Area** – Priority one areas where greater than 25% of the wells/springs show constituents higher than primary standards or other health standards.

**Landfill** – Areas of open and closed municipal and non-municipal landfills.

**LUST (Leaking Underground Storage Tank)** – Potential contaminant source sites associated with leaking underground storage tanks as regulated under RCRA.

**Mines and Quarries** – Mines and quarries permitted through the Idaho Department of Lands.)

**Nitrate Priority Area** – Area where greater than 25% of wells/springs show nitrate values above 5mg/l.

**NPDES (National Pollutant Discharge Elimination System)** – Sites with NPDES permits. The Clean Water Act requires that any discharge of a pollutant to waters of the United States from a point source must be authorized by an NPDES permit.

**Organic Priority Areas** – These are any areas where greater than 25 % of wells/springs show levels greater than 1% of the primary standard or other health standards.

**Recharge Point** – This includes active, proposed, and possible recharge sites on the Snake River Plain.

**RICRIS** – Site regulated under **Resource Conservation Recovery Act (RCRA)**. RCRA is commonly associated with the cradle to grave management approach for generation, storage, and disposal of hazardous wastes.

**SARA Tier II (Superfund Amendments and Reauthorization Act Tier II Facilities)** – These sites store certain types and amounts of hazardous materials and must be identified under the Community Right to Know Act.

**Toxic Release Inventory (TRI)** – The toxic release inventory list was developed as part of the Emergency Planning and Community Right to Know (Community Right to Know) Act passed in 1986. The Community Right to Know Act requires the reporting of any release of a chemical found on the TRI list.

**UST (Underground Storage Tank)** – Potential contaminant source sites associated with underground storage tanks regulated as regulated under RCRA.

**Wastewater Land Applications Sites** – These are areas where the land application of municipal or industrial wastewater is permitted by DEQ.

**Wellheads** – These are drinking water well locations regulated under the Safe Drinking Water Act. They are not treated as potential contaminant sources.

**NOTE:** Many of the potential contaminant sources were located using a geocoding program where mailing addresses are used to locate a facility. Field verification of potential contaminant sources is an important element of an enhanced inventory.

Where possible, a list of potential contaminant sites unable to be located with geocoding will be provided to water systems to determine if the potential contaminant sources are located within the source water assessment area.

## **References Cited**

Great Lakes-Upper Mississippi River Board of State and Provincial Public Health and Environmental Managers, 1997. "Recommended Standards for Water Works."

Idaho Department of Agriculture, 1998. Unpublished Data.

Idaho Department of Environmental Quality, 1997. Design Standards for Public Drinking Water Systems. IDAPA 58.01.08.550.01.

Idaho Department of Water Resources, 1993. Administrative Rules of the Idaho Water Resource Board: Well Construction Standards Rules. IDAPA 37.03.09.

University of Idaho, 2000. Moscow Basin Source Water Assessment. Idaho Water Resources Research Institute. University of Idaho. Moscow, Idaho. December 2000.



## Attachment A

# Valhalla Hills Mobile Home Park Susceptibility Analysis Worksheet

The final scores for the susceptibility analysis were determined using the following formulas:

- 1) VOC/SOC/IOC Final Score = Hydrologic Sensitivity + System Construction + (Potential Contaminant/Land Use x 0.2)
- 2) 2) Microbial Final Score = Hydrologic Sensitivity + System Construction + (Potential Contaminant/Land Use x 0.35)

Final Susceptibility Scoring:

0 - 5    Low Susceptibility

6 - 12   Moderate Susceptibility

≥ 13    High Susceptibility

1. System Construction		SCORE			
	Drill Date	2/28/64			
	Driller Log Available	YES			
	Sanitary Survey (if yes, indicate date of last survey)	YES	0		
	Well meets IDWR construction standards	NO	1		
	Wellhead and surface seal maintained	NO	1		
	Casing and annular seal extend to low permeability unit	NO	2		
	Highest production 100 feet below static water level	NO	1		
	Well located outside the 100 year flood plain	NO	1		
Total System Construction Score			6		
2. Hydrologic Sensitivity					
	Soils are poorly to moderately drained	YES	0		
	Vadose zone composed of gravel, fractured rock or unknown	YES	1		
	Depth to first water > 300 feet	NO	1		
	Aquitard present with > 50 feet cumulative thickness	NO	2		
Total Hydrologic Score			4		
3. Potential Contaminant / Land Use - ZONE 1A		IOC Score	VOC Score	SOC Score	Microbial Score
	Land Use Zone 1A	DRYLAND AGRICULTURE	1	1	1
	Farm chemical use high	YES	0	2	
	IOC, VOC, SOC, or Microbial sources in Zone 1A	YES	NO	NO	YES
Total Potential Contaminant Source/Land Use Score - Zone 1A		3	1	3	1
Potential Contaminant / Land Use - ZONE 1B					
	Contaminant sources present (Number of Sources)	YES	1	1	1
	(Score = # Sources X 2 ) 8 Points Maximum		2	2	2
	Sources of Class II or III leacheable contaminants or	YES	1	1	
	4 Points Maximum		1	1	
	Zone 1B contains or intercepts a Group 1 Area	NO	0	0	0
	Land use Zone 1B 25 to 50% Non-Irrigated Agricultural Land		1	1	1
Total Potential Contaminant Source / Land Use Score - Zone 1B		4	4	4	3
Potential Contaminant / Land Use - ZONE II					
	Contaminant Sources Present	YES	2	2	2
	Sources of Class II or III leacheable contaminants or	NO	0	0	0
	Land Use Zone II Greater Than 50% Non-Irrigated Agricultural		1	1	
Potential Contaminant Source / Land Use Score - Zone II		3	3	3	0
Potential Contaminant / Land Use - ZONE III					
	Contaminant Source Present	NO	0	0	0
	Sources of Class II or III leacheable contaminants or	NO	0	0	0
	Is there irrigated agricultural lands that occupy > 50% of	YES	1	1	
Total Potential Contaminant Source / Land Use Score - Zone III		1	1	1	0
Cumulative Potential Contaminant / Land Use Score		11	9	11	4
4. Final Susceptibility Source Score		12	12	12	12
5. Final Well Ranking		Moderate	Moderate	Moderate	High